

NEM:MJC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
-----X

UNITED STATES OF AMERICA

- against -

DABIN JEON,

Defendant.

REMOVAL TO THE
DISTRICT OF MAINE

(Fed. R. Crim. P. 5)

Case No. 24-MJ-293

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EASTERN DISTRICT OF NEW YORK, SS:

Jose Rodriguez-Aguilar, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation (“FBI”), duly appointed according to law and acting as such.

On or about March 7, 2024, the United States District Court for the District of Maine issued a warrant for the arrest of the defendant DABIN JEON for violating Title 18, United States Code, Sections 2261A(2)(B) (cyberstalking) and 875(c) (interstate communications).

The source of your deponent’s information and the grounds for his belief are as follows:¹

1. On or about March 7, 2024, a federal grand jury in the District of Maine returned a two-count indictment (the “Indictment”) charging the defendant DABIN JEON with violating Title 18, United States Code, Sections 2261A(2)(B) (cyberstalking) and 875(c) (interstate communications). A true and correct copy of the Indictment is attached as Exhibit 1.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. On or about, March 7, 2024, the United States District Court for the District of Maine issued a warrant (the “Warrant”) for the arrest of the defendant DABIN JEON. A true and correct copy of the Warrant is attached as Exhibit 2.

3. On or about April 17, 2024, law enforcement agents arrested the defendant DABIN JEON at his residence in Queens, New York, pursuant to the Warrant.

4. Following his arrest, the defendant DABIN JEON confirmed his name and date of birth to law enforcement agents, which matched the name and date of birth of the DABIN JEON wanted in the District of Maine. Law enforcement agents also compared the physical appearance of the defendant DABIN JEON to a photograph of DABIN JEON obtained during the investigation of the DABIN JEON wanted in the District of Maine and he appeared consistent with the person depicted in this photograph. Finally, the same law enforcement agents who conducted the arrest also previously interviewed the defendant DABIN JEON wanted in the District of Maine and the person arrested appeared to be the same person.

5. Based on the foregoing, I submit that there is probable cause to believe that the defendant is the DABIN JEON wanted in the District of Maine.

WHEREFORE, your deponent respectfully requests that the defendant DABIN JEON be removed to the District of Maine so that he may be dealt with according to law.

S/ Jose Rodriguez Aguilar

Jose Rodriguez-Aguilar
Special Agent
Federal Bureau of Investigation

Sworn to before me this
17th day of April, 2024

S/ Sanket Bulsara

THE HONORABLE SANKET J. BULSARA
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

EXHIBIT 1

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

SECRET

RECEIVED & FILED

UNITED STATES OF AMERICA

v.

DABIN JEON

2024 MAR -7 P 4:30

Case No.: 1:24-cr-00026-LEW

DEPUTY CLERK

INDICTMENT

The Grand Jury charges:

COUNT ONE
(Cyberstalking)

From about October 2021, the exact date being unknown, until about December 2022, in the District of Maine and elsewhere, the defendant,

DABIN JEON

with the intent to injure, harass, and intimidate another person, namely, V-1, used facilities of interstate and foreign commerce, including electronic communication systems and services, to engage in a course of conduct, specifically, the sending of text messages, digital images and videos, and other electronic communications to V-1, that caused, attempted to cause, or would be reasonably expected to cause, substantial emotional distress to V-1 and immediate family members.

All in violation of Title 18, United States Code, Sections 2261A(2)(B).

COUNT TWO
(Interstate Communications)

On about November 24, 2022, in the District of Maine and elsewhere, the defendant,

DABIN JEON

knowingly, willfully, and recklessly transmitted in interstate commerce a communication containing a threat to injure another. Specifically, the defendant made a telephone call from the state of New York to the state of Maine in which he made threats to harm the friends and family of V-1.

All in violation of Title 18, United States Code, Section 875(c).

Date: 3/7/24


Assistant U.S. Attorney

A True Bill,

Signature Redacted – Original on file
with the Clerk's Office

Grand Jury Foreperson

EXHIBIT 2

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the
District of Maine

United States of America

v.

DABIN JEON

Case No. 1:24-cr-00026-LEW

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) DABIN JEON,

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment
 ☐ Superseding Indictment
 ☐ Information
 ☐ Superseding Information
 ☐ Complaint
☐ Probation Violation Petition
 ☐ Supervised Release Violation Petition
 ☐ Violation Notice
 ☐ Order of the Court

This offense is briefly described as follows:

Count 1-Cyberstalking; 18:2261A(2)(B)

Count 2-Interstate Communications; 18:875(c)

Date: 03/07/2024City and state: Bangor, Maine

A TRUE COPY
 ATTEST: Christa K. Berry, Clerk
 Deputy Clerk

Issuing officer's signature

Margaret Melanson, Deputy Clerk

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title